

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

**UNITED STATES OF AMERICA,
Plaintiff,**

vs.

No. 18-CR-2945 WJ

**JANY LEVEILLE, et. al.,
Defendants.**

**UNOPPOSED MOTION TO EXCEED PAGE LIMIT ON
DEFENDANTS' MOTION TO SUPPRESS EVIDENCE**

COME NOW, the defendants by and through their counsel and hereby respectfully move this Court, pursuant to Rule 47.9 of the Local Rules of Criminal Procedure, for an order authorizing counsel to exceed the 27-page limit for motions, by 14 pages, and as reasons therefore submits the following:

1. The defense intends to file a motion to suppress evidence. However, because of the complexity of the issues to be litigated, the defense motion is approximately 41 pages in length.
2. In order to succinctly and adequately set forth the legal arguments with supporting Facts, the defense must exceed the current page limit by an additional 14 pages.
3. Counsel for Mr. Wahhaj has been in contact with AUSA Kimberly Brawley who advised the government does not oppose defendants' motion to exceed the page limit, by 14 pages.

Wherefore, for the foregoing reasons defendants respectfully request this Honorable Court issue an order authorizing defense counsel to exceed the page limit on the defendant's substantive motion to suppress evidence, by 14 pages.

Respectfully submitted,

Electronically filed 10-19-22

Erlinda O. Johnson
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CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of October 2022, I filed the foregoing motion electronically through the CM/ECF system, which caused opposing counsel for the Government to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

Electronically filed 10-19-22

Erlinda O. Johnson
Counsel for Mr. Wahhaj